

A04-0059

OCT 26 2001



**National
Environmental
Achievement Track**

U.S. Environmental Protection Agency

Application Form

DURA AUTOMOTIVE SYSTEMS INC.

Name of facility

DURA AUTOMOTIVE SYSTEMS INC. (ROCHESTER HILLS, MI)

Name of parent company (if any)

114 SPICER DRIVE

Street address

Street address (cont.)

GORDONSVILLE, TN 38563

City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name JASON BRAWNER

Title MANUFACTURING ENGINEER / ENVIRONMENTAL
REPRESENTATIVE

Phone (615) 683-3053

Fax (615) 683-6290

E-mail brawler.j@duraauto.com

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.

1 What do you do or make at your facility?

Automotive Parts

6 WAY POWER SEAT ADJUSTER
FOR GMT 800 PROGRAM

2 List the Standard Industrial Classification (SIC) codes or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC

3714

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

Yes ☒ No

4 How many employees (full-time equivalents) currently work at your facility?

Fewer than 50

50-99

☒ 100-499

500-1,000

More than 1,000



5 Does your facility have an EPA ID number(s) ?

☒ Yes ☐ No

If yes, list in the right-hand column.

TNR 00-000-3434

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right or enclose a completed Checklist with your application.

ENCLOSED

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

ISO 14001 CERTIFICATION WAS
OBTAINED IN SEPTEMBER 1999.

Why do we need this information?

Facilities need to have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy _____ ☒ Yes

b. Planning _____ ☒ Yes

c. Implementation and operation _____ ☒ Yes

d. Checking and corrective action _____ ☒ Yes

e. Management review _____ ☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes

3 Did this cycle include both an EMS and a compliance audit? ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes

If yes, what method of EMS assessment did you use?

Self-assessment

GEMI Other _____

CEMP _____

☒ Third-party assessment

☒ ISO 14001 Certification

Other _____

Why do we need this information?

Facilities need to show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you need to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
VULNERABILITY AND POTENTIAL FOR RELEASES - HAZARDOUS WASTE STORAGE		50,000 FT. ²		100 FT. ²
i. How is the current level an improvement over the previous level?				
<u>A REDUCTION IN TOTAL AREA EXPOSED TO HAZARDOUS WASTE STORAGE.</u>				
ii. How did you achieve this improvement?				
<u>PURCHASED A HAZARDOUS MATERIALS STORAGE BUILDING TO PLACE OUTSIDE OF THE FACILITY TO STORE HAZARDOUS MATERIALS, LOCK THEM UP, AND MAINTAIN SURVEILLANCE.</u>				

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
TOTAL MATERIALS USE - CARDBOARD USAGE REDUCTION	15,000 LBS / MONTH		7000 LBS / QUARTER	
i. How is the current level an improvement over the previous level?				
A REDUCTION IN CARDBOARD USAGE OF 152,000 LBS. PER YEAR.				
ii. How did you achieve this improvement?				
IMPLEMENTED A RETURNABLE PACKAGING PROGRAM.				

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you are a small facility, you need to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

a. What is the aspect?

TOTAL MATERIALS USE - PAPER USAGE
REDUCTION

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

Option A:
Absolute value
(Quantity/Units)

☒ Option B:
In terms of units
of production
or output 1496 SEAT ADJUSTERS /
REAMS OF PAPER
(Quantity/Units)

d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

Option A:
Absolute value 1571 SEAT ADJUSTERS /
REAMS OF PAPER
(Quantity/Units)

☒ Option B:
In terms of units
of production
or output

e. How will you achieve this improvement?

IMPLEMENT A PAPERLESS PRODUCTION SYSTEM
ENCOURAGE MEETINGS VIA VIDEO
5% REDUCTION

Second aspect you've selected

a. What is the aspect?

TOTAL SOLID WASTE

b. Is this aspect identified as significant in your EMS?

Yes ☒ No

Second aspect continues on the next page.

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: Absolute value 6240 YARDS³
(Quantity/Units)

Option B: In terms of units of production or output (Quantity/Units)

d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

☒ Option A: Absolute value 2496 YARDS³
(Quantity/Units)

Option B: In terms of units of production or output

e. How will you achieve this improvement?

REDUCE NUMBER OF PICK-UPS BY
SEGREGATING ALL RECYCLABLE
MATERIALS.

Third aspect you've selected

a. What is the aspect?

HAZARDOUS MATERIALS USE

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

Option A: Absolute value (Quantity/Units)

☒ Option B: In terms of units of production or output 611 SEAM ADJUSTERS /
DAINT PEN USED
(Quantity/Units)

d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

Option A: Absolute value 642 SEAM ADJUSTERS /
DAINT PEN USED
(Quantity/Units)

☒ Option B: In terms of units of production or output

e. How will you achieve this improvement?

SEEK ALTERNATIVE METHODS & MATERIALS
TO SUBSTITUTE FOR DAINT PENS.
5% REDUCTION

Fourth aspect you've selected

a. What is the aspect?

b. Is this aspect identified as significant in your EMS?

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

e. How will you achieve this improvement?

PACKAGING MATERIALS USED IN PRODUCT

Yes ☒ No

Option A:
Absolute value

(Quantity/Units)

☒ Option B:
In terms of units
of production
or output

2.25 CARDBOARD CORES/
SEAT ADJUSTER
(Quantity/Units)

Option A:
Absolute value

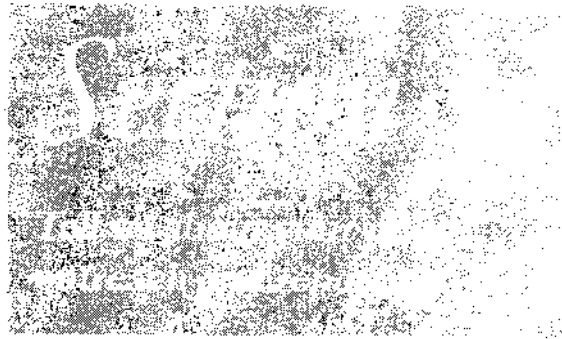
0 CARDBOARD CORES/
SEAT ADJUSTER
(Quantity/Units)

☒ Option B:
In terms of units
of production
or output

ELIMINATE USE OF CORES BY CHANGING
PACKAGING METHOD.

Why do we need this information?

Facilities need to demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.



What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

- SEVERAL EMPLOYEES ARE MEMBERS OF LOCAL COMMUNITY GROUPS.
- ISO 14001 OPEN HOUSES
- MAINTAIN COMMUNICATIONS WITH LOCAL OFFICIALS

2 How do you inform community members of important matters that affect them?

- THE E.R. REPRESENTATIVE WILL COMMUNICATE TO EXTERNAL INTERESTED PARTIES, CONTRACTORS, ETC.
- ALSO; SEE NUMBER 1

3 How will you make the Achievement Track Annual Performance Report available to the public?

Website www

Newspaper

X Open Houses

Other

4 Are there any ongoing citizen suits against your facility?

Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below.

	Organization	Name	Phone number
Representative of a Community/ Citizen Group	LEADERSHIP OPPORTUNITY OF SMITH COUNTY - CHAMBER OF COMMERCE	REGINA BROOKS	(615) 735-2093
State/Local regulator	TOWN OF GORDONSVILLE	LARRY BRADFORD	(615) 683-8282
Other community/local reference	SMITH COUNTY EXECUTIVE	WILLIAM BASS	(615) 735-2294

On behalf of DURA AUTOMOTIVE SYSTEMS INC.
[my facility], (GORDONSVILLE)

I certify that

I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;

- I have personally examined and am familiar with the information contained in this Application, (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

Paul Pouget Oct 19/01

Printed Name/Title

PAUL POUGET PLANT MANAGER

Facility Name

DURA AUTOMOTIVE SYSTEMS INC. (GORDONSVILLE)

Facility Street Address

114 SPICER DRIVE ; GORDONSVILLE , TN 38563

Facility ID Numbers

SIC - 3714 TNR 00-000-3434

We've included the following Checklist to help you answer questions in *Section A, Tell us about your facility*. This Checklist will help you identify the *major* federal, state, tribal, and local environmental requirements that apply at your facility, but it is not an exhaustive list of all environmental requirements that may be applicable at your facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application.

Air Pollution Requirements

Check all that apply.

- ☐ 1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61)
- ☐ 2. Permits and Registration of Air Pollution Sources
- ☐ 3. General Emission Standards, Prohibitions, and Restrictions
- ☐ 4. Control of Incinerators
- ☐ 5. Process Industry Emission Standards
- ☐ 6. Control of Fuel Burning Equipment
- ☐ 7. Control of VOCs
- ☐ 8. Sampling, Testing, and Reporting
- ☐ 9. Visible Emissions Standards
- ☐ 10. Control of Fugitive Dust
- ☐ 11. Toxic Air Pollutants Control
- ☐ 12. Vehicle Emissions Inspections and Testing

Other (you must list these)

- ☐ 13. Other Federal, State, Tribal, or Local Regulations not listed above.
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Hazardous Waste Management Regulations

Check all that apply.

- ☒ 1. Identification and listing of hazardous waste (40 CFR 261)
 - ☒ -Characteristic waste
 - ☐ -Listed Waste

- ☒ 2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
- ☐ -Manifesting
 - ☐ -Pre-transport requirements
 - ☐ -Record-keeping/Reporting
- ☒ 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
- ☐ -Transfer facility requirements
 - ☐ -Manifest system and Record-keeping
 - ☐ -Hazardous waste discharges
- ☐ 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
- ☐ -General facility standards
 - ☐ -Preparedness and prevention
 - ☐ -Contingency plan and emergency procedures
 - ☐ -Manifest system, record-keeping, and reporting
 - ☐ -Groundwater protection
 - ☐ -Financial requirements
 - ☐ -Use and management of containers
 - ☐ -Tanks
 - ☐ -Waste piles
 - ☐ -Land treatment
 - ☐ -Incinerators
- ☐ 5. Interim Standards for TSD Owners and Operators (40 CFR 265)
- ☐ 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267)
- ☐ 7. Administered Permit Program (Part B) (40 CFR 270)

Other (you must list these)

- ☐ 8. Other Federal, State, Tribal, or Local Regulations not listed above.

Hazardous Materials Management

Check all that apply.

- ☐ 1. Control of Pollution by Oil and other Hazardous Substances (33 CFR 153)
- ☐ 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302)
- ☒ 3. Hazardous Materials Transportation Regulations (49 CFR 172-173)
- ☒ 4. Worker Right-to-Know Regulations (29 CFR 1910.1200)
- ☒ 5. Community Right-to-Know Regulations (40 CFR 350-372)

Other (you must list these)

- ☐ 6. Other Federal, State, Tribal, or Local Regulations not listed above.

Solid Waste Management

Check all that apply.

- ☐ 1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257)
- ☐ 2. Permit Requirements for Solid Waste Disposal Facilities
- ☐ 3. Installation of Systems of Refuse Disposal
- ☐ 4. Solid Waste Storage and Removal Requirements
- ☐ 5. Disposal Requirements for Special Wastes

Other (you must list these)

- ☐ 6. Other Federal, State, Tribal, or Local Regulations not listed above.

Water Pollution Control Requirements

Check all that apply.

- ☐ 1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)
- ☐ 2. Designation of Hazardous Substances (40 CFR 116)
- ☐ 3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117)
- ☒ 4. NPDES Permit Requirements (40 CFR 122)
- ☐ 5. Toxic Pollutant Effluent Standards (40 CFR 129)
- ☐ 6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403)

Name of POTW _____

ID # of POTW _____

- ☐ 7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414)
- ☐ 8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415)
- ☐ 9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416)
- ☐ 10. Water Quality Standards
- ☐ 11. Effluent Limitations for Direct Dischargers
- ☐ 12. Permit Monitoring/Reporting Requirements
- ☐ 13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants
- ☐ 14. Collection, Handling, and Processing of Sewage Sludge
- ☐ 15. Oil Discharge Containment, Control, and Cleanup
- ☐ 16. Standards Applicable to Indirect Discharges (Pretreatment)

Other (you must list these)

- ☐ 17. Other Federal, State, Tribal, or Local Regulations not listed above.

Drinking Water Regulations

Check all that apply.

- ☐ 1. Underground Injection and Control Regulations, Criteria, and Standards (40 CFR 144, 146)
- ☐ 2. National Primary Drinking Water Standards (40 CFR 141)
- ☐ 3. Community Water Systems Monitoring and Reporting Requirements (40 CFR 141)
- ☐ 4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources
- ☐ 5. Underground Injection Control Requirements
- ☐ 6. Monitoring, Reporting, and Record-keeping Requirements for Community Water Systems

Other (you must list these)

- ☐ 7. Other Federal, State, Tribal, or Local Regulations not listed above.

Toxic Substances

Check all that apply.

- ☐ 1. Manufacture and Import of Chemicals, Record-keeping, and Reporting Requirements (40 CFR 704)
- ☐ 2. Import and Export of Chemicals (40 CFR 707)
- ☐ 3. Chemical Substances Inventory Reporting Requirements (40 CFR 710)
- ☐ 4. Chemical Information Rules (40 CFR 712)
- ☐ 5. Health and Safety Data Reporting (40 CFR 716)
- ☐ 6. Pre-manufacture Notifications (40 CFR 720)
- ☐ 7. PCB Distribution Use, Storage, and Disposal (40 CFR 761)
- ☐ 8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762)
- ☐ 9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)

Other (you must list these)

- ☐ 10. Other Federal, State, Tribal, or Local Regulations not listed above.

Pesticide Regulations

Check all that apply.

- ☐ 1. FIFRA Pesticide Use Classification (40 CFR 162)
- ☐ 2. Procedures for Storage and Disposal of Pesticides and Containers (40 CFR 165)
- ☐ 3. Certification of Pesticide Applications (40 CFR 171)
- ☐ 4. Pesticide Licensing Requirements
- ☐ 5. Labeling of Pesticides
- ☐ 6. Pesticide Sales, Permits, Records, Application, and Disposal Requirements
- ☐ 7. Disposal of Pesticide Containers
- ☐ 8. Restricted Use and Prohibited Pesticides

Other (you must list these)

- ☐ 9. Other Federal, State, Tribal, or Local Regulations not listed above.

Environmental Clean-up, Restoration, and Corrective Action

- ☐ 1. Comprehensive Environmental Response, Compensation, and Liability Act (Superfund). Please identify.

- ☐ 2. RCRA Corrective Action

- ☐ 3. Other Federal, State, Tribal, or Local Environmental Clean-up, Restoration, Corrective Action Regulations Not Listed Above.

Facility name:

Facility location:

Facility ID numbers:
